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SEMI-ANNUAL PRETREATMENT REPORT

FOR

DEC 3 2007

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BOSCH

ROBERT BOSCH TOOL CORPORATION Heber Springs, Arkansas Facility

November 2007

Prepared by:



Engineering, Compliance & Construction, Inc.
415 North McKinley, Suite 1180
Little Rock, Arkansas 72205

Telephone (501) 663-8247 • Facsimile (501) 664-5005

*talked to ECCI today
(penney Derry berry) & they
indicated facility was
currently in the process of
completely shutting down
their entire ops.
3/25/08 **AF***

AFIN# 120052


Semi-Annual Pretreatment Report
For Industrial Users Regulated by 40 CFR 433

Prepared for:

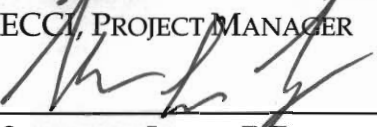
BOSCH

**ROBERT BOSCH TOOL CORPORATION
HEBER SPRINGS, ARKANSAS**

PREPARED BY:


PENNYE L. DERRYBERRY, REM, REPA
ECCI, PROJECT MANAGER

REVIEWED BY:


SHANNON LYNN, P.E.
ECCI, SENIOR ENGINEER

APPROVED BY:


TIM WAGGONER, PLANT MANAGER
ROBERT BOSCH TOOL CORPORATION

PREPARED BY:


ECCI

Engineering, Compliance & Construction, Inc.
415 North McKinley, Suite 1180
Little Rock, Arkansas 72205
Telephone (501) 663-8247 • Facsimile (501) 664-5005

(4) FLOW MEASUREMENT (CONT'D)					
INDIVIDUAL AND TOTAL PROCESS FLOWS DISCHARGED TO POTW IN GALLONS PER DAY (GPD)					
	Process	Average	Maximum	Type of Discharge	
	Regulated (core and Anc)	3,900	3,900	continuous	
	Regulated (Cyanide)	NA	NA	NA	
	§403.6 (e) Unregulated*	NA	NA	NA	
	Cooling Water	364.5	400	batch	
	Sanitary	2,339	4,277	continuous	
	Total Flow to POTW	6,604	8,577		

*Unregulated has a precise legal meaning; see 40CFR403.6(e).

(5) MEASUREMENT OF POLLUTANTS	
A. TYPE OF TREATMENT SYSTEM CHECK EACH APPLICABLE BLOCK	B. COMMENTS ON TREATMENT SYSTEM
<input type="checkbox"/> Neutralization <input type="checkbox"/> Chemical Precipitation and Sedimentation <input type="checkbox"/> Chromium Reduction <input type="checkbox"/> Cyanide Destruction <input type="checkbox"/> Other <input checked="" type="checkbox"/> None	None

C. THE INDUSTRIAL USER MUST PERFORM SAMPLING AND ANALYSIS OF THE EFFLUENT FROM ALL REGULATED PROCESSES--CORE AND ANCILLIARY (AFTER TREATMENT, IF APPLICABLE). ATTACH THE MOST RECENT LAB ANALYSIS; TABULATE ALL THE ANALYTICAL DATA COLLECTED DURING THE REPORT PERIOD IN THE SPACE PROVIDED BELOW. ZERO CONCENTRATIONS ARE NOT ACCEPTABLE; LIST THE DETECTION LIMIT IF CONCENTRATION WAS BELOW DETECTION LIMIT.

Pollutant (mg/l)	Cd	Cr	Cu	Pb	Ni	Ag	Zn	CN*	TTO*
Max for 1 day	0.69	2.77	3.38	0.69	3.98	0.43	2.61	1.2	2.13
Monthly Avg.	0.26	1.71	2.07	0.43	2.38	0.24	1.48	0.65	--
Max Measured	<0.004	<0.007	0.034	0.044	0.014	<0.007	0.46	<0.01	N/A
Avg. Measured	<0.004	<0.007	0.032	0.043	0.014	<0.007	0.41	<0.01	N/A

Sample Location: final discharge pipe from the metal finishing operations
 Sample Type (Grab or Composite) composite (metals) & grabs (cyanide)
 Number of Samples and Frequency Collected: one/six months
 40 CFR 136 Preservation and Analytical Methods Used: Yes No

(6) CERTIFICATION
A. CYANIDE CERTIFICATION (Applicability Pending)
[Reserved]

B. CHECK ONE: §433.11(e) TOXIC ORGANIC ANALYSIS ATTACHED §433.12(a) TTO CERTIFICATION PROVIDED BELOW

Based on my inquiry of the person or persons directly responsible for managing compliance with the pretreatment standard for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters had occurred since filing of the last semi-annual compliance report. I further certify that this facility is implementing the Toxic Organic Management Plan submitted to the Arkansas Department of Environmental Quality.

Tim Waggoner, Plant Manager

(Typed Name)

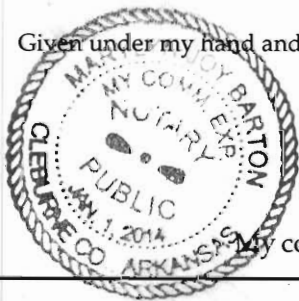
Tim Waggoner by Robert L. Togni
(Corporate Officer or authorized representative)

11/28/07
Date of Signature

STATE OF ARKANSAS)
COUNTY OF _____)

Before me, the undersigned authority, on this day personally appeared _____ of _____ a corporation, known to me to be the person whose name is subscribed to the foregoing instrument(s), and acknowledged to me that he executed the same for purposes and considerations therein expressed, in the capacity therein stated and as the act and deed of said corporation.

Given under my hand and seal of office on this 28th day of November, 2007.



Marylou Jay Barton
NOTARY Public in and for _____
County, Arkansas
My commission expires 1-1-2014

(7) POLLUTION PREVENTION ACT OF 1990 [42 u.s.c. 131010 ET SEQ.]

§6602 [42 U.S.C. 13101] Findings and Policy para(b) Policy.-- The Congress hereby declares it to be the national policy of the United States that pollution should be prevented or reduced at the source whenever feasible; pollution that cannot be prevented should be recycled in an environmentally safe manner, whenever feasible; pollution that cannot be prevented or recycled should be treated in an environmentally safe manner wherever feasible; and disposal or other release into the environment should be employed only as a last resort and should be conducted in an environmentally safe manner.

The User may list any new or ongoing Pollution Prevention practices:
Robert Bosch Tool Corporation has an ongoing commitment to pollution prevention. The facility is ISO 14001 certified which requires that they commit to responsible environmental management.

(8) GENERAL COMMENTS: None

(9) SIGNATORY REQUIREMENTS [40 CFR 403.12(1)]

I certify under penalty of law that I have personally examined and am familiar with the information in this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified individuals properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Tim Waggoner

NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

Tim Waggoner

SIGNATURE *by Robert L. Jorgensen*

Plant Manager

OFFICIAL TITLE

11/28/07

DATE SIGNED



Appendix A Analytical Data



Robert Bosch Tool Corporation
ATTN: Mr. Jim Bolhuis
250 Bolton Sullivan Drive
Heber Springs, AR 72543

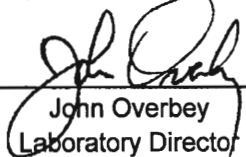
Dear Mr. Jim Bolhuis:

Project Description: Seven (7) water sample(s) received on October 31, 2007
November 2007 SAR
P.O. No. 8000063070

This report is the analytical results and supporting information for the samples submitted to American Interplex Corporation (AIC) on October 31, 2007. The following results are applicable only to the samples identified by the control number referenced above. Accurate assessment of the data requires access to the entire document. Each section of the report has been reviewed and approved by the appropriate laboratory director or a qualified designee.

Data has been validated using standard quality control measures performed on at least 10% of the samples analyzed. Quality Assurance, instrumentation, maintenance and calibration were performed in accordance with guidelines established by the cited methodology.

AMERICAN INTERPLEX CORPORATION

By  By KW
John Overbey
Laboratory Director

Enclosure(s): Chain of Custody

Robert Bosch Tool Corporation
250 Bolton Sullivan Drive
Heber Springs, AR 72543

CASE NARRATIVE

SAMPLE RECEIPT

Received Temperature: 1°C

Receipt Verification:	Complete Chain of Custody	Y
	Sample ID on Sample Labels	Y
	Date and Time on Sample Labels	Y
	Proper Sample Containers	Y
	Within Holding Times	Y
	Adequate Sample Volume	Y
	Sample Integrity	Y
	Proper Temperature	Y
	Proper Preservative	Y

COMMENTS

There were no qualifiers for this data and all samples met quality control criteria.

References:

"Methods for Chemical Analysis of Water and Wastes", EPA/600/4-79-020 (Mar 1983) with updates and supplements EPA/600/5-91-010 (Jun 1991), EPA/600/R-92-129 (Aug 1992) and EPA/600/R-93-100 (Aug 1993).

"Test Methods for Evaluating Solid Waste Physical/Chemical Methods (SW846)", Third Edition.

"Standard Methods for the Examination of Water and Wastewaters", 20th edition, 1998.

"American Society for Testing and Materials" (ASTM).

"Association of Analytical Chemists" (AOAC).

"Self-Davis and Moore" (2000).

Robert Bosch Tool Corporation
250 Bolton Sullivan Drive
Heber Springs, AR 72543

ANALYTICAL RESULTS

AIC No. 114220-1
Sample Identification: #1 10/30/07 0930

Analyte	Method	Result	RL	Units	Batch	Qualifier
Total Cyanide	SM4500-CN C,E	< 0.01	0.01	mg/l	W22884	

AIC No. 114220-2
Sample Identification: #2 10/30/07 10:30

Analyte	Method	Result	RL	Units	Batch	Qualifier
Total Cyanide	SM4500-CN C,E	< 0.01	0.01	mg/l	W22884	

AIC No. 114220-3
Sample Identification: #3 10/30/07 1:15

Analyte	Method	Result	RL	Units	Batch	Qualifier
Total Cyanide	SM4500-CN C,E	< 0.01	0.01	mg/l	W22884	

AIC No. 114220-4
Sample Identification: #4 10/30/07 2:15

Analyte	Method	Result	RL	Units	Batch	Qualifier
Total Cyanide	SM4500-CN C,E	< 0.01	0.01	mg/l	W22884	

AIC No. 114220-5
Sample Identification: Dup 10/30/07 2:15

Analyte	Method	Result	RL	Units	Batch	Qualifier
Total Cyanide	SM4500-CN C,E	< 0.01	0.01	mg/l	W22929	

AIC No. 114220-6
Sample Identification: RBTC 10/30/07 0930 - 1430

Analyte	Method	Result	RL	Units	Batch	Qualifier
Cadmium	EPA 200.7	< 0.004	0.004	mg/l	S21621	
Chromium	EPA 200.7	< 0.007	0.007	mg/l	S21621	
Copper	EPA 200.7	0.034	0.006	mg/l	S21621	
Lead	EPA 200.7	0.044	0.04	mg/l	S21621	
Nickel	EPA 200.7	0.014	0.01	mg/l	S21621	
Silver	EPA 200.7	< 0.007	0.007	mg/l	S21621	
Zinc	EPA 200.7	0.35	0.002	mg/l	S21621	

AIC No. 114220-7
Sample Identification: RBTC Dup 10/30/07 0930 - 1430

Analyte	Method	Result	RL	Units	Batch	Qualifier
Copper	EPA 200.7	0.030	0.006	mg/l	S21621	
Lead	EPA 200.7	0.043	0.04	mg/l	S21621	
Zinc	EPA 200.7	0.46	0.002	mg/l	S21621	

Robert Bosch Tool Corporation
250 Bolton Sullivan Drive
Heber Springs, AR 72543

SAMPLE PREPARATION REPORT

AIC No.	Analyte	Date/Time Prepared By	Date/Time Analyzed By	Dilution	Batch	Qualifier
114220-1	Total Cyanide	-	31OCT07 1404 258		W22884	
114220-2	Total Cyanide	-	31OCT07 1404 258		W22884	
114220-3	Total Cyanide	-	31OCT07 1404 258		W22884	
114220-4	Total Cyanide	-	31OCT07 1404 258		W22884	
114220-5	Total Cyanide	-	05NOV07 1437 258		W22929	
114220-6	Metals	01NOV07 1531 263	01NOV07 2042 235		S21621	
114220-7	Metals	01NOV07 1531 263	01NOV07 2046 235		S21621	

Robert Bosch Tool Corporation
250 Bolton Sullivan Drive
Heber Springs, AR 72543

LABORATORY CONTROL SAMPLE RESULTS

Analyte	Spike Amount	% Recovery	% Recovery Limits	RPD	RPD Limit	Batch	Qualifier
Cyanide	0.2 mg/l	89.5/90.5	85-115	1.11	20	W22884	
Cyanide	0.2 mg/l	91.5/92.0	85-115	0.545	20	W22929	
Cadmium	5 mg/l	95.6	85-115	-	20	S21621	
Chromium	0.5 mg/l	95.6	85-115	-	20	S21621	
Copper	0.5 mg/l	93.0	85-115	-	20	S21621	
Lead	5 mg/l	93.3	85-115	-	20	S21621	
Nickel	0.5 mg/l	93.4	85-115	-	20	S21621	
Silver	0.1 mg/l	98.1	85-115	-	20	S21621	
Zinc	0.5 mg/l	91.5	85-115	-	20	S21621	

MATRIX SPIKE SAMPLE RESULTS

Analyte	Spike Amount	% Recovery	% Recovery Limits	RPD	RPD Limit	Batch	Qualifier
Cyanide	0.2 mg/l	91.0/90.0	75-125	1.10	20	W22884	
Cyanide	0.2 mg/l	104/108	75-125	3.29	20	W22929	
Cadmium	5 mg/l	94.1/95.2	75-125	1.23	20	S21621	
Chromium	0.5 mg/l	92.6/95.0	75-125	2.55	20	S21621	
Copper	0.5 mg/l	94.6/95.8	75-125	1.29	20	S21621	
Lead	5 mg/l	96.8/98.3	75-125	1.53	20	S21621	
Nickel	0.5 mg/l	86.1/87.7	75-125	1.87	20	S21621	
Silver	0.1 mg/l	98.1/97.7	75-125	0.480	20	S21621	
Zinc	0.5 mg/l	90.0/89.7	75-125	0.399	20	S21621	

LABORATORY BLANK RESULTS

Analyte	Method	Result	Units	RL	QC Sample	Qualifier
Cyanide	SM4500-CN C,E	< 0.01	mg/l	0.01	W22884-1	
Cyanide	SM4500-CN C,E	< 0.01	mg/l	0.01	W22929-1	
Cadmium	EPA 200.7	< 0.004	mg/l	0.004	S21621-1	
Chromium	EPA 200.7	< 0.007	mg/l	0.007	S21621-1	
Copper	EPA 200.7	< 0.006	mg/l	0.006	S21621-1	
Lead	EPA 200.7	< 0.04	mg/l	0.04	S21621-1	
Nickel	EPA 200.7	< 0.01	mg/l	0.01	S21621-1	
Silver	EPA 200.7	< 0.007	mg/l	0.007	S21621-1	
Zinc	EPA 200.7	< 0.002	mg/l	0.002	S21621-1	

Robert Bosch Tool Corporation
250 Bolton Sullivan Drive
Heber Springs, AR 72543

QUALITY CONTROL PREPARATION REPORT

LABORATORY CONTROL SAMPLES

<u>Analyte</u>	<u>Date/Time Prepared By</u>	<u>Date/Time Analyzed By</u>	<u>Dilution</u>	<u>QC Sample</u>	<u>Qualifier</u>
Cyanide	-	31OCT07 1038 258		W22884-2	
Cyanide	-	31OCT07 1038 258		W22884-3	
Cyanide	-	05NOV07 1437 258		W22929-2	
Cyanide	-	05NOV07 1437 258		W22929-3	
Metals	01NOV07 1532 263	01NOV07 1914 270		S21621-2	

MATRIX SPIKE SAMPLES

<u>Analyte</u>	<u>Date/Time Prepared By</u>	<u>Date/Time Analyzed By</u>	<u>Dilution</u>	<u>QC Sample</u>	<u>Qualifier</u>
Cyanide	-	31OCT07 1038 258		W22884-4	
Cyanide	-	31OCT07 1038 258		W22884-5	
Cyanide	-	05NOV07 1437 258		W22929-4	
Cyanide	-	05NOV07 1437 258		W22929-5	
Metals	01NOV07 1532 263	01NOV07 1917 270		S21621-3	
Metals	01NOV07 1532 263	01NOV07 1921 270		S21621-4	

LABORATORY BLANKS

<u>Analyte</u>	<u>Date/Time Prepared By</u>	<u>Date/Time Analyzed By</u>	<u>Dilution</u>	<u>QC Sample</u>	<u>Qualifier</u>
Cyanide	-	31OCT07 1038 258		W22884-1	
Cyanide	-	05NOV07 1437 258		W22929-1	
Metals	01NOV07 1532 263	01NOV07 1910 270		S21621-1	

114220

ECCI

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

Client: Robert Bosch Tool Corporation		PO No.		ANALYSES REQUESTED									
Project Reference: November 2007 SAR		SAMPLE MATRIX		T. Cd, Cr, Cu, Pb, Ni, Ag, Zn C y a n i d e C u P b Z n									
Project Manager: P. Bray		W A T E R											
Sampled By: PLB		S O I L		Received on ice? (4C)? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> Remarks									
AIC NO		C O M P											
date/time collected		G R A B		Field pH calibration on ___ @ ___ Buffer:									
Sample Identification		X											
#1		10/30/07 0930		Symbol references: G = Glass P = Plastic V = VOA vials T = Sodium Thiosulfate NO = None S = Sulfuric acid pH2 B = NaOH to pH12 Z = Zinc acetate									
#2		10/30/07 1030											
#3		10/30/07 13:15		Turnaround Time Requested: (Please Circle) NORMAL or EXPEDITED IN ___ DAYS Expedited results requested by: _____ ECCI contact: P. Derryberry Phone: (501) 663-8247 Fax: 664-5005 Report Attention to: Jim Bolhuis Report Address to: 250 Bolton Sullivan Drive, Heber springs, AR									
#4		10/30/07 14:15											
Dup		10/30/07 14:15		Relinquished Date/Time By: _____ Relinquished Date/Time By: _____ Received Date/Time By: _____ Received Date/Time By: _____									
Metals		10/30/07 0930 to 1430											
Metals Dup		10/30/07 0930 to 1430		Comments:									
Container Type													
Preservative				Date/Time 10-31-07									
NO													



Engineering, Compliance & Construction, Inc.

415 North McKinley Street, Suite 1180 • Little Rock, Arkansas 72205 • Phone 501.663.8247 • Fax 501.664.5005 • www.ecci.com

November 27, 2007

Rocky Togni
Robert Bosch Tool Corporation
250 Bolton Sullivan Drive
Heber Springs, AR 72543

Dear Rocky,

Enclosed you will find two (2) copies of the Semi-Annual Pretreatment Report prepared for the Robert Bosch Tool Corporation, Heber Springs, Arkansas facility for the reporting period of May 1, 2007 to October 31, 2007. Please have Mr. Waggoner sign the copies in the places indicated with the flags. There is also one location that requires the signature of a Notary Public. One copy of the report should be forwarded by certified mail to the ADEQ at the following address by November 30, 2007.

Arkansas Department of Environmental Quality
NPDES, Pretreatment Section
5301 Northshore Drive
North Little Rock, AR 72118-5317
ATTN: Mr. Rufus Torrence

The other copy is to be maintained within your facility storm water records.

Thank you for this opportunity to provide environmental services to the Robert Bosch Tool Corporation in Heber Springs, AR. Please let me know if I can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read 'Penny L. Derryberry Bray', is written over the typed name and title.

Penny L. Derryberry Bray, REM, REPA
Senior Environmental Scientist